

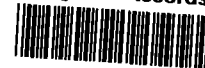


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

100000003

MAY 25 2000

EPA Region 5 Records Ctr.



247928

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: **ACTION MEMORANDUM** - Request for an Emergency Removal Action at the Crest Hill Trailer Site, Will County, Illinois (Site ID # B5M1)

FROM: Thomas D. Cook, On-Scene Coordinator
Emergency Response Branch - Section 3

TO: Richard Karl, Chief
Emergency Response Branch

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$4,610 in order to abate a substantial threat to public health and the environment posed by an abandoned semi-trailer left on a street in Crest Hill, Will County, Illinois (hereinafter called Crest Hill Trailer Site). This memorandum also seeks to confirm the verbal authorization of \$15,000 by Richard Karl, Chief, Emergency Response Branch, on March 22, 2000. The emergency response action addressed the Site by sampling, repackaging, and transporting/disposing of 23 acetylene-type cylinders 1 fuel tank and 2 drums of paint waste. This activity was necessary because the semi-trailer was in a busy commercial area of the city making it difficult to secure the site.

On March 22, 2000, U.S. EPA conducted the emergency response action, in accordance with Section 104(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a), to prevent a release of hazardous substance, pollutants or contaminants due to the presence of unsecured solvents and flammables in a highly traveled commercial and residential area. The abandoned trailer contained numerous flammable acetylene-type cylinders and a couple of drums of paint waste, containing potentially flammable solvents.

The emergency response action eliminated the threat of a potential release because the semi-trailer was abandoned without placards and locks, on a street in an active commercial and residential area. An inventory of the semi-trailer revealed 23 acetylene-type cylinders, 1 fuel tank and two 55- gallon drums of paint waste. U.S. EPA performed this response action under Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

This site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILSFN0507993

A.Site Description

1. Background

On March 16, 2000, the Will County Office of Emergency Management received an Emergency call from Crest Hill Police Department about an abandoned trailer on Route 53. The Will County Office of Emergency Management requested the assistance of IEPA, who then requested the presence of U.S.EPA at the site.

U.S.EPA's Emergency Response Branch performed an emergency removal on March 22, 2000. IEPA, the Will County Office of Emergency Management, the Crest Hill Police Department, and the Lockport Fire Department were present during the removal activities. During the removal U.S. EPA sampled the drums for disposal parameters and staged the drums, fuel tank and 23 cylinders on visqueen for inventory. Upon completion of inventory, the drums were overpacked and transported to a City of Crest Hill municipal facility for secure storage.

2. Physical location

The abandoned trailer was found on the north side of Route 53, Crest Hill, Will County, Illinois. Geographical coordinates for this location are latitude 41° 33' 20"N and longitude 88° 5' 20"W. The unsecured trailer was in very poor condition.

3. Site characteristics

As mentioned earlier, this Site was originally located on Route 53 off to the side of the road in a busy commercial area of Crest Hill. According to the attached environmental justice analysis (Attachment III), residents closest to the site reside in census tract 8809. In Illinois, the low-income percentage is 27 % and the minority percentage is 25 %. To meet EJ concern criteria, the area within 1 mile of the site must have a population that is twice the state low-income percentage and/or twice the state minority percentage. That is, the area must be at least 54 % low-income and/or 50 % minority. At this Site, the low-income percentage is 18.1 % and the minority percentage is 13.43 % as determined by Arcview or Landview III EJ analysis. Therefore, this site does not meet the Region's EJ criteria based on the demographics as identified in "Region 5 Interim Guidelines For Identifying and Addressing a Potential EJ case, June 1998."

4. Release or threatened release into the environment of a hazardous substance, pollutant, or contaminant

On March 22, 2000, the IEPA called to notify U.S. EPA of the abandoned trailer and requested that U.S. EPA respond to the scene since the drums were visible through the back of the trailer. As discussed in greater detail below, U.S EPA determined that the rusty conditions of the trailer, the

flammability of the acetylene cylinders, the unclear nature of the chemicals in the drums, and the close proximity of the trailer to a commercial district constituted a threat of release into the environment of a hazardous substance, pollutant, or contaminant.

5. NPL status

This site is neither on nor proposed for listing on the National Priorities List.

6. Current actions

There are no further actions planned regarding this site.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Crest Hill Site presented an imminent and substantial threat to the public health, or welfare, and the environment, and met the criteria for an emergency removal action provided for in the National Contingency Plan (NCP), Section 300.415, Paragraph (b)(2). 40 C.F.R. 300.415(b)(2)(i), (vi) and (vii), respectively, specifically allows removal actions for:

a) actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants, or contaminants;

This factor was present at the Site due to the presence of volatile organic compounds (VOCs) and flammable wastes inside several drums as detected by field screening techniques. The site is located in a busy commercial area beside a heavily traveled highway. The drums were not secured and were accessible to the public. The local Police Department noticed evidence of vandalism to the trailer.

b) threat of fire and explosion;

The threat of fire and explosion was present at this Site because the flammable waste found on site could be classified as RCRA ignitable and/or reactive hazardous substances based on field screening.

c) The availability of other appropriate Federal or State response mechanism to respond to the release.

On March 22, 2000, IEPA called to notify U.S. EPA of the abandoned trailer and requested U.S. EPA's assistance. Neither the local Fire Department nor the State had the appropriate equipment and/or resources to address the release and/or threat of release.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the hazardous substances on Site, and the potential exposure pathways to nearby populations described in Sections II and III above, actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may have resulted in an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The response actions described in this memorandum directly address the threat of releases of ignitable and/or reactive waste which posed a threat to public health and the environment. Emergency response activities at the site include: developing a health and safety plan, relocating the contents of the trailer, sampling the contents of the trailer, and arranging for the disposal of the contents.

Emergency response activities under this memorandum took approximately one on-site working day to complete. The threats posed by identified hazardous waste materials met the criteria listed in Section 300.415(b)(2) of the NCP and were consistent with the removal actions performed. Furthermore, no post-removal controls were necessary.

The detailed cleanup contractor costs are presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor	\$ 3,200
Extramural Contingency (10%)	<u>320</u>
TOTAL, EXTRAMURAL COSTS	\$ 3,520

INTRAMURAL COSTS:

U.S. EPA Direct Cost [\$30/hr x (10 Regional + 5 HQ hrs)]	\$ 450
U.S. EPA Indirect Costs (\$64/hr x 10 Regional hrs)	<u>640</u>
TOTAL, INTRAMURAL COSTS	\$ 1,090
TOTAL REMOVAL PROJECT CEILING	<u><u>\$ 4,610</u></u>

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

All applicable or relevant and appropriate requirements (ARARs) were complied with to the extent practicable.

Emergency response activities performed pursuant to this Action Memorandum shall, to the extent practicable considering the exigencies of the situation, attain ARARs identified by the IEPA. Accordingly, since IEPA referred the Site to U.S. EPA, the OSC has maintained coordination with Don Klopke of IEPA, concerning this Site and potential ARARs.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or non-action would have resulted in the increased likelihood of a direct contact threat to human or wildlife populations accessing the Site.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum.

IX. RECOMMENDATIONS

This decision document represents the selected removal action for the Crest Hill Trailer, Will County, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site. Conditions at the Site met the NCP Section 300.415 (b) (2) criteria for a removal and I recommend your approval of this removal action. The total project ceiling, if approved, will be \$15,000. Of this, an estimated \$3,520 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVAL: Thomas Verbecher, Acting DATE: 5-25-00
Chief, Emergency Response Branch

DISAPPROVAL: _____ DATE: _____
Chief, Emergency Response Branch

Confidential Enforcement Addendum

Attachments

1. Cleanup Contractor Cost Estimate
2. Index of the Administrative Record

cc: K. Mould, U.S. EPA, OERR, 5202-G
M. Chezik, U.S. Dept. of the Interior. **w/o Enf. Addendum**
T. Skinner, IEPA, Springfield, **w/o Enf. Addendum**

CREST HILL TRAILER SITE
WILL COUNTY, ILLINOIS
AR ORIGINAL

DOCUMENT #3

"Action Memorandum: Request for an Emergency Removal Action at the
Crest Hill Trailer Site"

BCC PAGE
1-Page

REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 1

DETAILED CLEANUP CONTRACTOR COST ESTIMATE
CREST HILL TRAILER EMERGENCY RESPONSE SITE
CREST HILL, ILLINOIS

APRIL, 2000

The estimated cleanup contractor costs are as follows:

Personnel	\$ 1,972.85
Equipment	444.08
Materials/other	713.07

Total	\$ 3,129.00
--------------	--------------------

ATTACHMENT 2

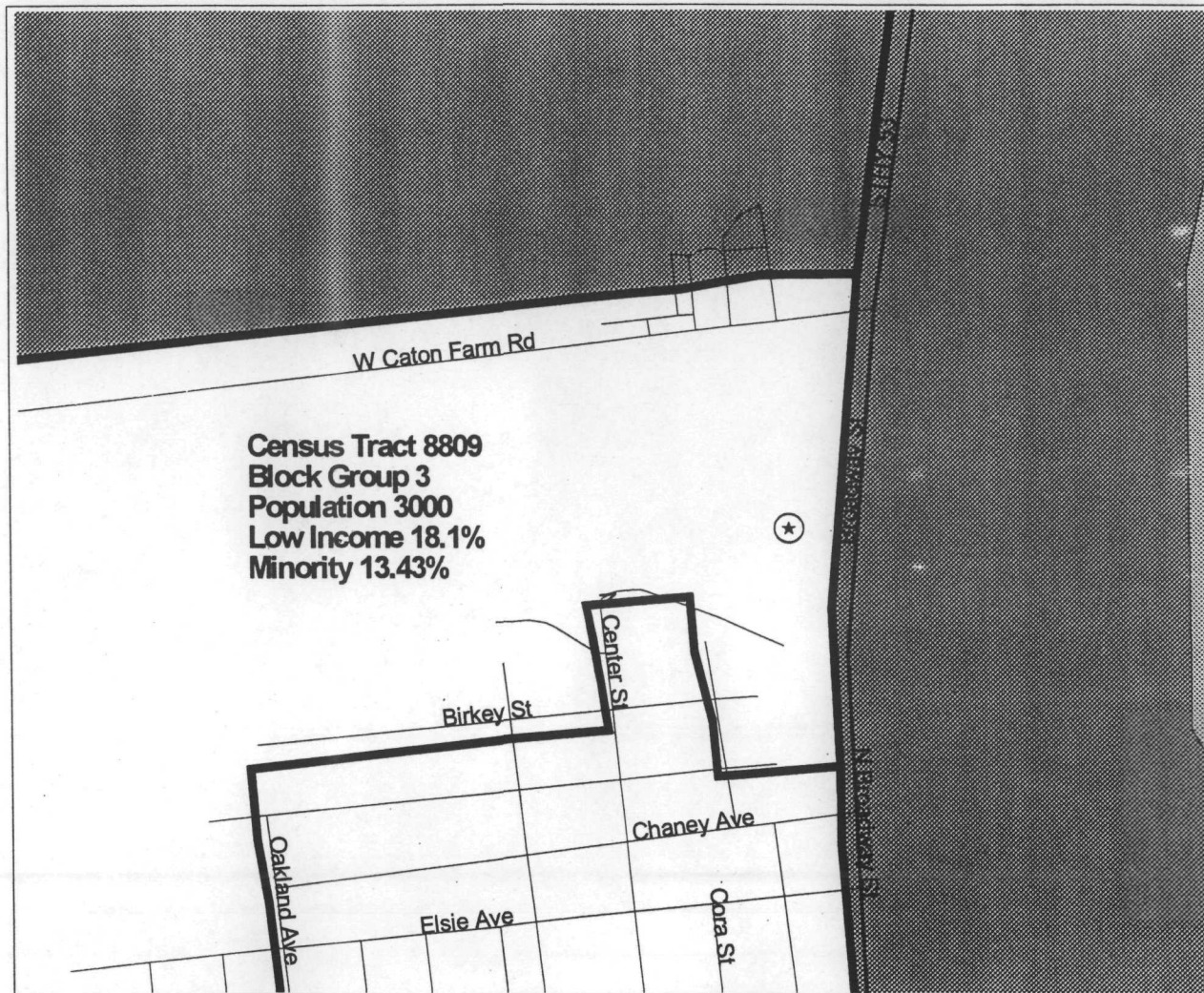
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTIONADMINISTRATIVE RECORD
FOR
CREST HILL TRAILER SITE
CREST HILL, WILL COUNTY, ILLINOISORIGINAL
MAY 24, 2000

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	03/22/00	Klopke, D., Illinois EPA	Karl, R., U.S. EPA	Letter re: Illinois EPA's Request for U.S. EPA's Assistance at the Crest Hill Trailer Site	1
2	05/02/00	Will County Emergency Management Agency	U.S. EPA	FAX Transmission Forward- ing Attached Will County EMA Incident Report, Will County EMA Incident Log and Illinois EMA Field Report re: the Abandoned Trailer in Crest Hill, IL	6
2	00/00/00	Cook, T., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the Crest Hill Trailer Site (PENDING)	




Region 5 Superfund EJ Analysis

Crest Hill Trailer Site

Crest Hill, Illinois



EJ Identification *

-  Low Income and Minority Less than State Average
-  Low Income or Minority at or Greater than State Average
-  Low Income or Minority 2 Times or Greater than State Average
[meets Region 5 EJ Case criteria]

★ Site Location

— Block Group Boundary

Region 5 EJ Case Criteria for Illinois

Minority: 50% or greater

Low Income: 54% or greater



Date of Map: 03/30/00

Source of Map: 1990 Census Database